## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA EASTERN DIVISION

MARTHA SWANN,	)
Plaintiff,	) )
V.	) Case No. 2:24-cv-00244-RAH-JTA
EAST ALABAMA MEDICAL CENTER,	) UNOPPOSED
Defendant	)

## DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT

COMES NOW, Defendant East Alabama Medical Center ("Defendant"), by and through its undersigned counsel, and respectfully requests the Court extend Defendant's deadline to file its Reply Brief in Support of its Motion for Summary Judgment by one (1) week. In support of this Unopposed Motion, Defendant states as follows:

- 1. Counsel for Defendant has conferred with counsel for Plaintiff regarding this Motion and underlying request for a one-week extension. Counsel for Plaintiff does not oppose this Motion.
- 2. On July 3, 2025, Defendant filed its Motion for Summary Judgment (Doc. 40), along with a supporting brief. (Doc. 41.)

- 3. On July 15, 2025, Plaintiff filed her Response in Opposition to Defendant's Motion for Summary Judgment, which consisted of a fifty-seven (57) page brief and voluminous evidentiary record. (Doc. 46, 47.) On July 16, 2025, the Court entered a Text Order requiring Defendant to file a reply to Plaintiff's Response on or before July 23, 2025. (Doc. 48.)
- 4. Separately, following briefing on Plaintiff's Motion to Compel and the Court's decision compelling the deposition of Roben Casey, Plaintiff filed a Motion for Attorneys' Fees in connection with that Motion. (Doc. 39.) On July 7, 2025, the Court set a briefing schedule on that Motion, which requires Defendant to file a Response by July 22, 2025 and Plaintiff to file a Reply by July 29, 2025. (Doc. 43.)
- 5. Plaintiff filed an Unopposed Motion for an Extension from this July 29, 2025 deadline (Doc. 44), which the Court granted and thereby extended Plaintiff's Reply deadline to August 8, 2025. (Doc. 45.)
- 6. In light of Defendant's July 22, 2025 deadline to respond to Plaintiff's Motion for Attorneys' Fees, Defendant respectfully requests a one-week extension until July 30, 2025 to file its Reply Brief in Support of its Motion for Summary Judgment.
- 7. This request is not made for the purpose of undue delay, and Defendant respectfully submits that this one-week extension will not pose any undue burden or prejudice any party.

WHEREFORE, PREMISES CONSIDERED, Defendant respectfully requests the Court grant this Unopposed Motion for Extension of Time and allow Defendant through and including July 30, 2025 to file its Reply Brief in Support of its Motion for Summary Judgment.

Respectfully submitted,

/s/ Warren B. Lightfoot, Jr.

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Attorneys for Defendant East Alabama Medical Center

## **CERTIFICATE OF SERVICE**

I hereby certify that on July 17, 2025, I electronically filed a copy of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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/s/ Warren B. Lightfoot, Jr.
OF COUNSEL